

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GARY KOOPMANN, TIMOTHY KIDD and  
VICTOR PIRNIK, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V.,  
FCA US LLC, ROLAND ISELI AND  
ALESSANDRO BALDI, AS CO-EXECUTORS  
FOR THE ESTATE OF SERGIO  
MARCHIONNE, SCOTT KUNSELMAN,  
MICHAEL DAHL, STEVE MAZURE, and  
ROBERT E. LEE,

Defendants.

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No. 15 Civ. 7199 (JMF)

**ORAL ARGUMENT  
REQUESTED**

**DEFENDANTS' NOTICE OF  
MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying (i) Defendants' Memorandum in Support of Their Motion for Summary Judgment, (ii) Defendants' Local Civil Rule 56.1 Statement of Material Facts as to Which There Is No Genuine Issue To Be Tried, and (iii) Declarations of Mark Chernoby, Robert Lee, Joshua S. Levy, Eric Mayne, Thomas McCarthy, Jon Nelson, Richard Palmer, Steven Siko, and Joseph Veltri, and their attached exhibits, Defendants Fiat Chrysler Automobiles N.V., FCA US LLC, the Estate of Sergio Marchionne, Scott Kunselman, Michael Dahl, Steve Mazure, and Robert E. Lee, by and through their undersigned counsel, will move this Court, before the Honorable Jesse M. Furman, United States District Judge, at a time and date to be set by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 56(b), granting judgment in their favor as to all claims asserted in

Plaintiffs' Fourth Amended Complaint (ECF No. 129), together with such other and further relief as the Court deems just and proper.

Dated: December 12, 2018  
New York, New York

Respectfully submitted,

/s/ Robert J. Giuffra, Jr.  
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